

# Exhibit A

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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

**Gregory Stamper,**

Plaintiff,

vs.

**Freebird Logistics, Inc.,** an Arizona  
corporation, **Jeffrey Larsen and Jane  
Doe Larsen,** a married couple, and **Kurt  
Larsen and Jane Doe Larsen II**

Defendants.

No. 2:22-cv-00155-MTL

**DECLARATION OF PLAINTIFF  
GREGORY STAMPER IN SUPPORT  
OF MOTION FOR ENTRY OF  
DEFAULT JUDGMENT AGAINST  
DEFENDANTS**

I, Gregory Stamper, declare under penalty of perjury that the following is true and correct:

1. I am the Plaintiff in the above titled matter.
2. All statements in my Complaint are true and accurate.
3. I was an employee of Defendants Freebird Logistics, Inc and Jeffrey Larsen (“Defendants”).
4. Defendants Freebird Logistics, Inc and Jeffrey Larsen were my employers.

1           5. Defendants own and/or operate as a package delivery service.

2           6. I worked for Defendants as a driver and driver's helper for approximately 8  
3 shifts, totaling approximately 96 hours hours during September and October 2021.

4           7. Defendants employed me as a driver and driver's helper. My job duties  
5 were all manual labor. My rate of pay while working for Defendants was \$200 per day.  
6

7           8. During my employment with Defendants, I generally worked  
8 approximately 12 hours per day for each day I worked for Defendants, totaling  
9 approximately 96 hours.  
10

11           9. During my first week I worked approximately 72 hours, resulting in 32  
12 hours of overtime.

13           10. During my second week I woked approximately 24 hours.

14           11. Defendants did not pay me any wage whatsoever for all time I worked for  
15 them.  
16

17           12. By my calculation, I am owed an unpaid \$200 per day for all 8 days I  
18 worked for Defendants, for a total of \$1,600.

19           13. To summarize, in total, I believe I am owed \$1,600 in unpaid minimum  
20 wages and other wages under the FLSA and Arizona law.  
21

22           14. I also believe I am owed \$266.72 in unpaid overtime wages under the  
23 FLSA.

24           15. Additionally, I am owed additional statutory damages pursuant to 29 U.S.C.  
25 § 216(b), which provides for an additional equal amount of damages; ARS § 23-364,  
26 which provides for an additional amount equal to twice the unpaid wages; and ARS § 23-  
27

1 355, which provides for treble damages.

2 16. Therefore, I am owed \$4,800 ( $\$1,600 * 3$ ) in unpaid federal minimum  
3 wages and state minimum and other wages.

4 17. I am also owed \$533.44 ( $\$266.72 * 2$ ) in unpaid overtime premiums  
5 pursuant to the FLSA.  
6

7 18. Therefore, pursuant to the aforementioned statutes, I believe I am entitled to  
8 a total award of \$5,333.44, plus reasonable attorneys' fees and costs.  
9

10 EXECUTED this 18<sup>th</sup> Day of March, 2022.

11 

12 Gregory Stamper (Mar 18, 2022 10:43 PDT)

13 Gregory Stamper

14 Date: Mar 18, 2022  
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